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## UNITED STATES DISTRICT COURT DISTRICT OF OREGON

UNITED STATES OF AMERICA

Case No. 3:16-MJ-00004-03

v.

AMMON BUNDY,
JON RITZHEIMER,
JOSEPH O'SHAUGHNESSY,
RYAN PAYNE,
RYAN BUNDY,
BRIAN CAVALIER,
SHAWNA COX,
PETER SANTILLI,

MOTION FOR REVIEW OF RELEASE ORDER

## **Defendants.**

The United States of America, by Billy J. Williams, United States Attorney for the District of Oregon, and Ethan D. Knight and Geoffrey A. Barrow, Assistant United States Attorneys, moves the Court for a review of the order releasing defendant O'Shaughnessy on conditions (ECF No. 32). The government seeks detention of O'Shaughnessy as a risk of flight and a danger to the community. The basis for the requested detention is set forth in the Government's Memorandum

in Support of Pretrial Detention (ECF No. 23) and before the Magistrate Court on January 29,

2016. The government may offer additional evidence at the February 2, 2016, detention hearing.

Dated this 1st day of February 2016.

Respectfully submitted,

BILLY J. WILLIAMS United States Attorney

s/ Geoffrey A. Barrow
ETHAN D. KNIGHT, OSB #99298
GEOFFREY A. BARROW
Assistant United States Attorneys